

Combined State Plan for Nebraska's Workforce Development System: Summary of Public Comments and Responses

The Nebraska Departments of Labor, Education, and Health and Human Services and the Nebraska Commission for the Blind and Visually Impaired released the Combined State Plan for Nebraska's Workforce System in compliance with the Workforce Innovation and Opportunity Act and sought public comment for a 30-day period beginning January 15, 2016 and ending February 18, 2016.

In addition, a public hearing was held on February 5, 2016 at the Nebraska State Office Building, 14th & M Streets, Lincoln, Nebraska. The hearing was made available simultaneously at ten (10) Nebraska Vocational Rehabilitation locations across the state through interactive video conferencing technology:

- Columbus – 3100 23rd Street, Suite 5
- Fremont – 827 North D Street
- Grand Island – 203 East Stolley Park Road, Suite B
- Kearney – 315 West 60th Street, Suite 400
- Lincoln – 3901 North 27th Street, Suite 6
- Norfolk - 1212 Benjamin Avenue
- North Platte - 200 South Silber, Building 2
- Omaha - 1313 Farnam on the Mall
- Omaha - 12011 Q Street
- Scottsbluff – 505A Broadway, Suite 500

Questions regarding this summary may be sent to ndol.wioa_policy@nebraska.gov.

This summary may be accessed on the Nebraska Department of Labor *Manuals, Plans, and Reports* webpage, which is accessible at dol.nebraska.gov and can be located by:

- clicking on the *Resources* tab on the Nebraska Department of Labor homepage,
- then clicking on the orange *WIOA* button, and
- then clicking on the *Manuals, Plans, and Reports* tab.

Table 1. Public comments received in writing

Commenter & Topic	Comments	Response to Comments
<p>Commenter: Nebraska Statewide Independent Living Council and 13 other supporting organizations</p> <p>Topic: Requesting greater specificity in the Combined Plan around five themes.</p>	<ul style="list-style-type: none"> • Adopt Employment First Policies and implement across agencies and programs • Integrate Vocational Rehabilitation and American Job Center programs and efforts • Increasing marketing and outreach efforts to raise awareness of disability employment • Increase public awareness and program transparency • Evaluate Employment Outcomes 	<p>The Combined State Plan will not be providing additional specificity around these themes at this time. Specificity will be developed as the plan partners, the Nebraska Workforce Development Board, and local workforce development boards work to put the Nebraska's Combined State Plan into action. When appropriate to the requirements of the Combined State Plan, that specificity may be added at the first revision.</p> <ul style="list-style-type: none"> • Employment First is an initiative driven by state governors and not a part of the WIOA legislation. • The plan partners, American Job Centers, along with the Nebraska Workforce Development board and local workforce development boards will begin working on marketing and outreach to all job seekers and employers and integrating the services of the plan partner programs. The plan partners recognize the challenges of outreach to a large diverse population and getting the message to the priority populations identified in WIOA. • WIOA defines the required data elements to be reported. As the mandated core partners work together on data collection and sharing, part of that process will involve looking at what disaggregate data can meaningfully be gathered and reported.
<p>Commenter: Nebraska Appleseed</p> <p>Topic: Alignment of training, assistance programs, career pathways and service prioritization</p>	<ul style="list-style-type: none"> • Better alignment of human service and labor programs • Career Pathways • Priority of services 	<p>The Combined State Plan will not be providing additional specificity around these themes at this time. Specificity will be developed as the plan partners, the Nebraska Workforce Development Board, and local workforce development boards work to put the Nebraska's Combined State Plan into action. When appropriate to the requirements</p>

Commenter & Topic	Comments	Response to Comments
		<p>of the Combined State Plan, that specificity may be added at the first revision.</p> <ul style="list-style-type: none"> • As the plan partners work to implement the Combined State Plan, they and the Nebraska Workforce Development board and local workforce development boards will begin working on system alignment, integration of services, and career pathway development. • WIOA establishes the requirements for establishing priority of services. Under WIOA, the Governor and local workforce development boards provide direction to one-stop operators in local workforce development areas in terms of making determinations relation to priority of services in compliance with WIOA.
<p>Commenter: RespectAbility</p> <p>Topic: Multiple comments around greater clarity, precision and data need to ensure the people with disabilities will be better equipped to pursue the American Dream</p>	<ul style="list-style-type: none"> • Make busting stigmas, myths, and misconceptions a key part of Nebraska's workforce strategy • Need for strategy alignment of workforce development and economic development to expand employment for people with disabilities • Ensure that the best data points, including the Labor Force Participation Rates of people with disabilities v. those without disabilities, are used in performance metrics • Section 503 of the Rehabilitation Act and Federal Contractors offer Nebraska the chance to innovate, collaborate, and expand opportunity 	<p>The Combined State Plan will not be providing additional specificity around these themes at this time. Specificity will be developed as the plan partners, the Nebraska Workforce Development Board, and local workforce development boards work to put the Nebraska's Combined State Plan into action. When appropriate to the requirements of the Combined State Plan, that specificity may be added at the first revision.</p> <ul style="list-style-type: none"> • As the plan partners work to implement the Combined State Plan, they and the Nebraska Workforce Development board and local workforce development boards will begin working on marketing and outreach to all job seekers and employers and integrating the services of the plan partner programs. The plan partners recognize the challenges of outreach to a large diverse population and getting the message to the priority populations identified in WIOA.

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	<ul style="list-style-type: none"> • Beware “Order of Selection” and Utilize a “Jackie Robertson Strategy” • Overcome the gap between disability services and career services in post-secondary education • Ensure that apprenticeship programs are fully accessible and actively recruiting young people with disabilities, especially with government contractors • Prioritize pre-employment training and expand partnerships with VR • Ensure that the assurances in your WIOA checklist are matched up to a strategy to fully implement them and be successful • Avoid the opportunity costs of focusing too much on One-Stop Centers programmatic accessibility is critically important • Transportation is a vital component and it must be addressed directly • Getting out the word on free and accessible services and resources • Nothing about us without us: Include representative from the disability community and the state VR program on the State Board • Aging workers and those with recently acquired disabilities must be specifically addressed in the plan • Strategic engagement to build a buddy/mentor system for people customers of the Workforce System 	<ul style="list-style-type: none"> • The Combined State Plan includes goals and strategies for development of Nebraska’s Workforce System, which include the development and implementation of industry sector partnerships and strategies. • WIOA defines the required data elements to be reported. As the mandated core partners work together on data collection and sharing, part of that process will involve looking at what disaggregate data can meaningfully be gathered and reported. • The plan partners, American Job Centers, along with the Nebraska Workforce Development board and local workforce development boards will begin working on marketing and outreach to all job seekers and employers and integrating the services of the plan partner programs. The plan partners recognize the challenges of outreach to a large diverse population and getting the message to the priority populations identified in WIOA. • As the plan partners work to implement the Combined State Plan, they and the Nebraska Workforce Development board and local workforce development boards will begin working to ensure a comprehensive network of interrelated services addressing a wide spectrum of jobseeker and employer needs, including accessibility of services and employer engagement. • Under WIOA, states are required to make services and programs available and accessible through One-stop Centers. During implementation of the Combined State Plan, the plan partners, the Nebraska Workforce Development Board and local workforce development boards will begin working to ensure Nebraska’s One-stop Centers

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	<ul style="list-style-type: none"> • The disability issues of people involved in the corrections system must be addressed 	<p>are compliant with applicable legal requirements and provide programmatic accessibility to all job seekers and employers.</p> <ul style="list-style-type: none"> • Local workforce development boards are responsible for the development of policies on the provision of support services, including those addressing the transportation needs of job seekers. The public is encouraged to engage with local workforce development boards on the provision of supportive services. • A key feature of the Combined State Plan is the integration of services and programs provided by plan partners and the elimination of duplicated services. Agencies providing services outside of those provided by plan partners are encouraged to collaborate with the plan partners in making their resources available to job seekers and employers on the local, regional and state levels. • WIOA defines the membership requirements for state and local workforce development boards. Governors and chief elected officials of local workforce development areas, respectively, are responsible for appointments to state and local workforce development boards. Interested organizations and members of the public are encouraged to recommend appointments to the Nebraska Workforce Development Board and local workforce development boards. • Nebraska's Senior Community Service Employment Program (SCSEP) is a plan partners and provides training for aging workers through community service organizations. As trainees reach job-ready status, SCSEP works with a wide variety of organizations for placement.

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<p>Commenter: Easter Seals Nebraska</p> <p>Topic: Discussion points and questions</p>	<ul style="list-style-type: none"> • List work incentives counseling as a supportive service • Detail a plan for educating employers around reasonable accommodations, responsibilities under ADA, sensitivity and disability etiquette, self-disclosure, 503 compliance and incentives to hire individuals with disability • Include self-advocacy, peer modeling and disability disclosure information in leadership training for youth • Further define what is meant by financial education and the intended outcome • Consult with certified Work Incentive Specialists when working with job seekers receiving SSDI and/or SSI due to a disability • Will the state's employment database system support electronic referrals to engaged partners for needed services 	<p>The Combined State Plan will not be providing additional specificity around these themes at this time. Specificity will be developed as the plan partners, the Nebraska Workforce Development Board, and local workforce development boards work to put the Nebraska's Combined State Plan into action. When appropriate to the requirements of the Combined State Plan, that specificity may be added at the first revision.</p> <ul style="list-style-type: none"> • Local workforce development boards are responsible for the development of policies on the provision of support services, including those addressing the transportation needs of job seekers. The public is encouraged to engage with local workforce development boards on the provision of supportive services. • As the plan partners work to implement the Combined State Plan, they and the Nebraska Workforce Development board and local workforce development boards will begin working to ensure a comprehensive network of interrelated services addressing a wide spectrum of jobseeker and employer needs, including accessibility of services and employer engagement. • Plan partners and local workforce development boards determine the scope of youth services and programs. The public is encouraged to work with plan partners and local workforce development boards in relation to potential changes to services and programs. • Financial counseling is mentioned in the Combined State Plan as a service provided under the Rapid Response program for dislocated workers.

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		<ul style="list-style-type: none"> • As the plan partners work to implement the Combined State Plan, they and the Nebraska Workforce Development board and local workforce development boards will begin working to ensure a comprehensive network of integrated services for all job seekers and employers. • As the plan partners work to implement the Combined State Plan, they and the Nebraska Workforce Development board and local workforce development boards will begin working toward the development of common intake procedures and promoting knowledge transfers across partner programs to help facilitate referrals.
<p>Commenter: Nebraska Commission for the Deaf and Hard of Hearing</p> <p>Topic: NCDHH not listed as a partner</p>	<ul style="list-style-type: none"> • Is the Nebraska Commission for the Deaf and Hard of hearing part of the partners, as it is not listed as such? 	<p>At this juncture, the Combined State Plan focuses on those partners prescribed in the Workforce Innovation and Opportunity Act (WIOA) Sec. 102 (a) and Sec. 103 (a)(2). However, this does not preclude NCDHH from being a partner in Nebraska's Workforce System.</p>
<p>Commenter: Meghan Chaffee on behalf of Senator Burke Harr</p> <p>Topic: Focus on serving Nebraska's most vulnerable workers and reducing the barrier to employment for Nebraska's most vulnerable workers</p>	<ul style="list-style-type: none"> • Include language in the plan requiring agencies of coordinate with each other to provide health care and employment services to individuals with disabilities • Include the goal of removing employment disincentives from those chronically unemployed and underemployed and include referral services for individuals receiving Medicaid assistance to employment and education programs • Require exiting programs to conduct outreach and education on the availability and benefits of these programs 	<p>The Combined State Plan will not be providing additional specificity around these themes at this time. Specificity will be developed as the plan partners, the Nebraska Workforce Development Board, and local workforce development boards work to put the Nebraska's Combined State Plan into action. When appropriate to the requirements of the Combined State Plan, that specificity may be added at the first revision.</p> <ul style="list-style-type: none"> • As the plan partners work to implement the Combined State Plan, they and the Nebraska Workforce Development board and local workforce development boards will begin working to ensure a comprehensive network of integrated services for all job seekers and employers.

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	<ul style="list-style-type: none"> • Target the specific workforce needs of an occupational sector within the state 	<ul style="list-style-type: none"> • The plan partners, American Job Centers, along with the Nebraska Workforce Development board and local workforce development boards will begin working on marketing and outreach to all job seekers and employers and integrating the services of the plan partner programs. The plan partners recognize the challenges of outreach to a large diverse population and getting the message to the priority populations identified in WIOA. • The Combined State Plan includes goals and strategies for development of Nebraska's Workforce System, which include the development and implementation of industry sector partnerships and strategies.
<p>Commenter: Anonymous</p> <p>Topic: Critique of the current NE-DOL reemployment services program and unemployment benefits</p>	<ul style="list-style-type: none"> • <i>Comments offered are not relevant to the Combined State Plan for Nebraska's Workforce System</i> 	<ul style="list-style-type: none"> • Comments provided have been forwarded to the appropriate representatives of NDOL's Employment Services and Unemployment Benefits programs. • Comments were forwarded to the Greater Nebraska local area for follow up.
<p>Commenter: Kearney Housing Agency (KHA)</p> <p>Topic: Lack of access for Kearney area clients and KHA staff to work with a workforce office</p>	<ul style="list-style-type: none"> • How can referrals be made to the Greater Nebraska AJC in Grand Island? • More support is needed than the KHA can provide • Concern about the effectiveness of Benefits Counseling provided by Vocational Rehabilitation based on a single case • Concerns about the NEworks website for job search not being user friendly 	<ul style="list-style-type: none"> • As the plan partners work to implement the Combined State Plan, they and the Nebraska Workforce Development board and local workforce development boards will begin working to ensure a comprehensive network of integrated services for all job seekers and employers, including accessibility.

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<p>Commenter: Nebraska Association of Service Providers</p> <p>Topic: Offering perspective on several issues</p>	<ul style="list-style-type: none"> • Providers of developmental disability services and other stakeholders should be involved in leadership and planning at all levels including positions on local Workforce Investment Boards • Concerns with the stated need to strengthen communication between workforce partners • Changes in WIOA to the definition of support employment and the use of customized employment and the changes in the service provide in the adult developmental disabilities system need to align • More proactive, personalized and trained support is needed in servicing students and families in the high school system with providers in the developmental disabilities system need to be a part of the continuum of transition services • Encourages shared, consistent assessments and assessment processes once the rules and regulations regarding the role of Vocational Rehabilitation with students transitioning from high school to the development disability system are issued • Noted the challenges of the (1) lack of transportation, (2) engaging employers to increase the number and types of businesses adopting customized employment, and (3) 	<p>The Combined State Plan will not be providing additional specificity around these themes at this time. Specificity will be developed as the plan partners, the Nebraska Workforce Development Board, and local workforce development boards work to put the Nebraska's Combined State Plan into action. When appropriate to the requirements of the Combined State Plan, that specificity may be added at the first revision.</p> <ul style="list-style-type: none"> • At this juncture, the Combined State Plan focuses on those partners prescribed in the Workforce Innovation and Opportunity Act (WIOA) Sec. 102 (a) and Sec. 103 (a)(2). However, this does not preclude the NASP or its member organizations from being a partner in Nebraska's Workforce System. • WIOA defines the membership requirements for state and local workforce development boards. Governors and chief elected officials of local workforce development areas, respectively, are responsible for appointments to state and local workforce development boards. Interested organizations and members of the public are encouraged to recommend appointments to the Nebraska Workforce Development Board and local workforce development boards. • As the plan partners work to implement the Combined State Plan, they and the Nebraska Workforce Development board and local workforce development boards will begin working to ensure <ul style="list-style-type: none"> ○ a comprehensive network of integrated services for all job seekers and employers ○ development and alignment of terminology across programs

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	<p>locating, accessing and coordinating community services and supports.</p>	<ul style="list-style-type: none"> ○ accessibility of services and employer engagement ● Local workforce development boards are responsible for the development of policies on the provision of support services, including those addressing the transportation needs of job seekers. The public is encouraged to engage with local workforce development boards on the provision of supportive services
<p>Commenter: Phil Baker, Nebraska Department of Labor</p> <p>Topic: Proposed revisions to Labor Market Information System description</p>	<ul style="list-style-type: none"> ● Suggested revision of and additional language for the Labor Market Information System description 	<p>Appropriate updates made to the Combined State Plan.</p>
<p>Commenter: Experience Works, Inc.</p> <p>Topic: Sentence structure, updated map</p>	<ul style="list-style-type: none"> ● Page 273, Greatest Economic Need, Sentence structure appears to be incorrect ● SCSEP Appendix C, map out of date 	<p>Appropriate updates made to the Combined State Plan.</p>
<p>Commenter: Ashley Pick, American Job Center, Grand Island, NE</p> <p>Topic: Correction</p>	<ul style="list-style-type: none"> ● The address of the Grand Island location is 203 E Stolley Park Rd. Ste. A (Not Ste. B) 	<p>Incorrect address appears on the “How to Provide Comments” page of the draft Combined State Plan, which will be deleted from the final version.</p>
<p>Commenter: Becky Maggart, Nebraska Department of Labor, Norfolk, NE</p> <p>Topic: Correction</p>	<ul style="list-style-type: none"> ● Incorrect references to adult programs in description of Eligibility for Youth Programs policy description <i>and</i> WIA on page 379 	<p>Appropriate updates made to the Combined State Plan.</p>

Table 2. Public comments receive during the Public Hearing held February 5, 2016

Commenter & Topic	Comments	Response to Comment
<p>Commenter: Greater Fremont Developmental Council</p> <p>Topic: Question regarding the new regional planning areas, pre-employment transition services, and Career Pathways</p>	<ul style="list-style-type: none"> • Asking if Dodge County (Fremont) would be part of Metro Region for regional planning but receive local workforce development services from the Greater Lincoln Workforce Development Area if the governor approves the recommended regional planning areas and local workforce development areas • Clarification of who can receive the pre-employment transition services • Clarification if Career Pathways are only available to students with a disability and students under a Section 504 plan 	<p>As the plan partners work to implement the Combined State Plan, they and the Nebraska Workforce Development board and local workforce development boards will begin working on system alignment, integration of services, and career pathway development.</p>
<p>Commenter: Nebraska State Independent Living Council</p> <p>Topic: Representation and identify students under a 504 Plan</p>	<ul style="list-style-type: none"> • People with disabilities should be mandated partners • How will students under a 504 Plan be identified for services 	<ul style="list-style-type: none"> • Under WIOA, mandated core programs are: <ul style="list-style-type: none"> ◦ the Adult Program (Title I of WIOA), ◦ the Dislocated Worker Program (Title I), ◦ the Youth Program (Title I), ◦ the Adult Education and Literacy Program (Title II), ◦ the Wagner-Peyser Act Program (Wagner-Peyser Act, as amended by title III), and ◦ the Vocational Rehabilitation Program (Title I of the Rehabilitation Act of 1973, as amended by Title IV), which includes the Nebraska Commission for the Blind and Visually Impaired. • Specificity will be developed as the plan partners, the Nebraska Workforce Development Board, and local workforce development boards work to put the Nebraska's Combined State Plan into action.

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<p>Commenter: Nebraska State Independent Living Council Chair</p> <p>Topic: Combining the efforts of all the employment programs and the involvement of CILs</p>	<ul style="list-style-type: none"> • More detail needed on how the collaboration with the American Job Centers will occur • Need for wrap around services for out-of-school youth • Department of Education needs to market to families and parents of 504 students about Vocational Rehabilitation. • The plan does not address how CIL and partners will work together 	<p>The Combined State Plan will not be providing additional specificity around these themes at this time. Specificity will be developed as the plan partners, the Nebraska Workforce Development Board, and local workforce development boards work to put the Nebraska's Combined State Plan into action. When appropriate to the requirements of the Combined State Plan, that specificity may be added at the first revision.</p> <ul style="list-style-type: none"> • The plan partners, American Job Centers, along with the Nebraska Workforce Development board and local workforce development boards will begin working on marketing and outreach to all job seekers and employers and integrating the services of the plan partner programs. The plan partners recognize the challenges of outreach to a large diverse population and getting the message to the priority populations identified in WIOA. • As the plan partners work to implement the Combined State Plan, they and the Nebraska Workforce Development board and local workforce development boards will begin working on system alignment, integration of services, including services for out-of-school youth. • A key feature of the Combined State Plan is the integration of services and programs provided by plan partners and the elimination of duplicated services. Agencies providing services outside of those provided by plan partners are encouraged to collaborate with the plan partners in making their resources available to job seekers and employers on the local, regional and state levels.

Commenter & Topic	Comments	Response to Comment
Commenter: Heartland Workforce Solutions Topic: Common intake and inclusion of both planned partners and other stakeholders	<ul style="list-style-type: none"> • This goal is consistent with the direction that the Heartland Workforce Solutions is taking 	<p>A key strategy of the Combined State Plan is development of common intake procedures among plan partners.</p>
Commenter: Community Action Program Topic: Question on support services	<ul style="list-style-type: none"> • Will there be more funding for support services as defined on page 37 	<p>Federal funding of programs under the Workforce Innovation and Opportunity Act is determined by Congress.</p>
Commenter: Heartland Workforce Solutions Topic: Pre-employment Transition Services and Career Pathways	<ul style="list-style-type: none"> • Are pre-employment transition services only for available for youth with a disability and students under a 504 Plan • Are Career Pathways only available to students with a disability or students under a 504 Plan 	<p>Specificity will be developed as the plan partners, the Nebraska Workforce Development Board, and local workforce development boards work to put the Nebraska's Combined State Plan into action.</p>
Commenter: Adult Education, Central Community College Topic: Question about the status of out of school youth	<ul style="list-style-type: none"> • If someone is out of school in a GED or post-secondary class, are they considered out of school? 	<p>Under WIOA, the definition of "in school" is based on each state's definition of "attending school;" and WIOA's definition of "out of school" means not "attending any school." In terms of youth taking in postsecondary courses, they would be considered in school. For youth enrolled in a GED program, it is possible they could be considered out-of-school. Local workforce development area representatives would determine the in-school/out-of-school status of youth.</p>
Commenter: Proteus Topic: Wagner-Peyser program sharing outreach information	<ul style="list-style-type: none"> • Concern expressed that there is not a system for sharing outreach and or referral information with the Migrant Farm Worker program. 	<p>The final version of the Combined State Plan will include information relating to Nebraska's Agricultural Outreach Plan based on the requirements of the final rules for submission of a state plan.</p>